

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

THE STATE OF NEVADA,
DEPARTMENT OF EMPLOYMENT
TRAINING and REHABILITATION, *ex*
rel. CHAGOLLA,

Plaintiff,

vs.

LYFT, INC.,

Defendant.

Case No.: 3:23-cv-00442-ART-CLB

ORDER GRANTING

**STIPULATION TO EXTEND TIME
FOR PLAINTIFF TO RESPOND TO
DEFENDANT'S MOTION TO
RECONSIDER (ECF 55) AND
DEFENDANT'S MOTION TO CERTIFY
QUESTIONS TO THE NEVADA
SUPREME COURT (ECF 56)**

(FIRST REQUEST)

Plaintiff THE STATE OF NEVADA, DEPARTMENT OF EMPLOYMENT TRAINING and REHABILITATION, *ex rel.* CHAGOLLA ("Plaintiff") and Defendants LYFT, INC. ("Defendants") (collectively the "Parties"), by and through their undersigned counsel, hereby agree and stipulate to extend time for Plaintiff to file their response to Defendant's Motion to Reconsider (ECF 55) and Defendant's Motion to Certify the Questions to the Nevada Supreme Court (ECF 56) from the current deadlines of Tuesday, February 11, 2025 up to and including **Tuesday, March 4, 2025.**

This is the first request for an extension of time to respond to Defendant's Motions.

1 This instant request for an extension is needed because Plaintiff's Lead Counsel has a
2 current pending deadline to submit an appellate brief in a separate case before the Nevada
3 Supreme Court. This extension is requested and sought prior to the expiration of the deadline in
4 question.

5 This stipulation is made in good faith and not for the purposes of undue delay or burden.
6 No parties are prejudiced by this stipulation.

7
8 DATED: January 31, 2025

9 Respectfully submitted,

10 /s/ Joshua D. Buck

11 Mark R. Thierman, Nev. Bar No. 8285
12 Joshua D. Buck, Nev. Bar No. 12187
13 Leah L. Jones, Nev. Bar No. 13161
14 **THIERMAN BUCK LLP**
15 *Attorneys for Plaintiff*


Respectfully submitted,

10 /s/ Jeremy S. Schneider

Kirsten A. Milton, Esq. Nev. Bar No. 14401
Joshua A. Sliker, Esq. Nev. Bar No. 12493
Jeremy S. Schneider (*Pro Hac Vice*)
Matthew E. Kreiser (*Pro Hac Vice*)
JACKSON LEWIS P.C.
Attorneys for Defendant, Lyft, Inc.

17 **IT IS SO ORDERED.**

18
19 DATED: February 3, 2025

21 
22 _____
23 ANNE R. TRAUM
24 UNITED STATES DISTRICT JUDGE
25
26
27
28